REMARKS

Claims 1-34 are pending in the above-mentioned application. The Office Action has rejected claims 1-34. Applicant has amended claims 1, 3, 7, 8, 20, 22, 23, 25, 26, 27, 28, 29, 30, 31, and 32 to more clearly recite Applicant's invention. In particular and in accordance with Office Action item numbering, the Office Action has:

In items 2-3, provisionally rejected claims 1-34 under 35 U.S.C. §101, as claiming the same invention as that of claims 1-34 in a copending application of the same inventor;

In items 4-5, rejected claims 1-13 and 20-31 under 35 U.S.C. §102(e) as being anticipated by Sonesh, U.S. Patent No. 6,046,762;

In items 6-7, rejected claims 7 and 27 under 35 U.S.C. §103(a) as being unpatentable over Sonesh in view of Reksten, U.S. Patent No. 6,396,909; and

In item 8, rejected claims 14-19 and 32-34 as being unpatentable over Sonesh under 35 U.S.C. §103(a).

Applicant's response is directed to each item in turn.

Regarding Items 2-3, Applicant believes that the claims as amended herein will overcome the provisional section 101 rejection.

Regarding items 4-5, the Office Action has alleged that Sonesh teaches the limitations of independent claims 1, 29 and 31. Applicant has amended claims 1, 29 and 31 to more clearly recite Applicant's invention. Applicant respectfully submits that Sonesh does not teach each and every limitation of claims 1, 29 and 31.

In particular and with respect to claim 1, Applicant believes that Sonesh does not teach the limitation of "receiving one or more incoming calls by a call manager object, a call manager object being present in each of the plurality of computing nodes" as recited therein, because Sonesh only discloses a single system, the MMACD server 110, which answers a call, determines the caller's identity and which routes the call to a selected agent. Sonesh, Col. 7, line 57 to Col. 8, line 21. The other computing nodes 100, 105, 121, 120, 120, are not capable of performing call management operations. Also, Sonesh's MMACD server is not itself an object in the sense used in Applicant's application. Such an object has private data structures and methods which carry out the functions assigned to the object and no such object is disclosed in Sonesh. Furthermore, Sonesh does not teach the limitation of claim 1 "each *call object* including the

department table with which the call is currently associated…managing the incoming call according to a call-management policy *based on the information contained in the table* and the input signals from the caller to attempt to reach one of the plurality of agents of the organization," as recited therein. Sonesh has no call object and no table contained therein having information on which a call-management policy is based. Sonesh has instead assigned call-management policy to the MMACD sever 110. Sonesh, Col. 7, line 65 to Col. 8, line 1. The Office Action has identified the call object of Applicant's invention with caller's data which is sent to agent workstations 120 or 121. However, caller's data does not meet the limitation "each *call object* including the *department table* with which the call is currently associated," because caller's data is not a call object and caller's data does not contains table on which a call-management policy is based. Therefore, Sonesh fails to teach each and every limitation of the present invention as recited in claim 1.

Regarding claims 29 and 31, Applicant respectfully submits that claim 29 and 31 each have limitations similar to those in claim 1. Claim 29 now recites "A computer processing storage medium for a data processing system having a plurality of computing nodes, the medium having stored thereon a program for managing incoming calls for an organization having a plurality of departments, and a plurality of agents, the program residing on each computing node of the data processing system…". Claim 31 now recites a call manager object being present in each of a plurality of computing nodes…". Therefore, Applicant believes that Sonesh fails to teach each and every limitation recited in claims 29 and 31.

Regarding independent claim 26, the Office Action has alleged that Sonesh teaches the limitations recited therein. However, Applicant respectfully submits that Sonesh fails to teach the limitation "(a) receiving an incoming voice call by a call manager object, a call manager object being present in each of the plurality of computing nodes," because Sonesh only describes a single system, the MMACD server 110, which answers a call, determines the caller's identity and which routes the call to a selected agent. Furthermore, Sonesh fails to teach the limitation "each call object including the department table with which the call is currently associated…determining whether or not an agent is available for the selected item in the department table," because Sonesh fails to teach the use of a call object or a call object that contains the table for determining whether the agent is available. Instead, Sonesh teaches that the MMACD server 110 determines whether the agent is available. Also, caller's data is not the

same as the call object of the present invention, and contains no table. Therefore, Sonesh fails to teach each and every limitation of the present invention as recited in claim 26.

Regarding claim 6, Applicant respectfully submits that Sonesh does not teach the limitations of claim 6 at least because Sonesh does not teach the limitations of claim 1, from which 6 depends. Additionally, Sonesh does not teach the limitation "wherein in a table includes alternate routing information...if the agent is not available, handling the call according to alternate routing information." Instead, Sonesh states that "If an agent is not available, the call is placed in an appropriate queue." Sonesh, Col. 8, lines 9-12. Therefore, Sonesh does not teach each and every limitation of claim 6.

Regarding claim 30, Applicant respectfully submits that Sonesh does not teach the limitation "wherein the table includes agent availability information and alternative routing information," for the reasons given regarding claim 6.

Regarding claim 13, Applicant respectfully submits that Sonesh does not teach the limitations of claim 13 at least because Sonesh does not teach the limitations of claim 1, from which claim 13 depends.

Regarding claim 9, Applicant respectfully submits that Sonesh does not teach the limitations of claim 9, at least because Sonesh does not teach the limitations of claim 1, from which claim 9 indirectly depends.

Regarding claim 24, Applicant respectfully submits that Sonesh does not teach the limitations of claim 24, at least because Sonesh does not teach the limitations of claim 1, from which claim 24 depends. Additionally, Sonesh does not teach the limitation "wherein the call object is capable of being coupled to an ISDN PSTN system...," because Sonesh does not teach the use of a call object or a coupling of a call object to an ISDN PSTN system. Therefore, Sonesh does not teach each and every limitation of claim 24.

Regarding claim 25, Applicant respectfully submits that Sonesh does not teach the limitations of claim 25, at least because Sonesh does not teach the limitations of claim 1, from which claim 25 depends. Additionally, Sonesh does not teach the limitation "wherein the call manager object is capable of being coupled to an ISDN PSTN system...," because Sonesh does not teach the use of a call manager object or a coupling of a call manager object to an ISDN PSTN system. Therefore, Sonesh does not teach each and every limitation of claim 25.

Regarding claim 28, Applicant respectfully submits that Sonesh does not teach the limitations of independent claim 28 because Sonesh does not teach the limitation "a main memory included in each computer processing node connected to an ISDN channel, wherein the main memory stores a computer program instructing the computer processing node to carry out the steps of: receiving an incoming call from a caller by a call manager object." Sonesh only discloses a single system, the MMACD server 110, which answers a call, determines the caller's identity and which routes the call to a selected agent. Sonesh, Col. 7, line 57 to Col. 8, line 21. Sonesh does not teach the presence of a call manager object in each computer processing node. Therefore, Sonesh does not teach each and every limitation in claim 28.

Regarding claim 2, Applicant respectfully submits that Sonesh does not teach the limitations of claim 2 at least because Sonesh does not teach the limitations of claim 1, from which claim 2 depends.

Regarding claim 3, Applicant respectfully submits that Sonesh does not teach the limitations of claim 2 at least because Sonesh does not teach the limitations of claim 1, from which claim 3 depends. Additionally, Sonesh does not teach the limitation "receiving a selection event from the caller by the call object," because Sonesh does not disclose the use of a call object or the use of a call object to receive a selection event. Therefore, Sonesh does not teach each and every limitation of the present invention as recited in claim 3.

Regarding claim 4, Applicant respectfully submits that Sonesh does not teach the limitations of claim 4 at least because Sonesh does not teach the limitations of claim 1 and claim 3, the latter being the claim from which claim 4 depends.

Regarding claim 5, Applicant respectfully submits that Sonesh does not teach the limitations of claim 5 at least because Sonesh does not teach the limitations of claim 1 and claim 3, the latter being the claim from which claim 5 depends.

Regarding claim 8, Applicant respectfully submits that Sonesh does not teach the limitations of claim 8 at least because Sonesh does not teach the limitations of claim 1.

Regarding claim 10, Applicant respectfully submits that Sonesh does not teach the limitations of claim 10, at least because Sonesh does not teach the limitations of claim 9, from which claim 10 depends.

Regarding claim 11, Applicant respectfully submits that Sonesh does not teach the limitations of claim 11, at least because Sonesh does not teach the limitations of claim 10, from

which claim 11 depends. Additionally, Sonesh does not teach the limitation "wherein the information communicated includes agent status and queries not visible to the caller," because Sonesh is silent about what information remote agents communicate to the organization of the ISDN channel.

Regarding claim 12, Applicant respectfully submits that Sonesh does not teach the limitations of claim 12, at least because Sonesh does not teach the limitations of claim 8, from which claim 12 depends.

Regarding claim 20, Applicant respectfully submits that Sonesh does not teach the limitations of claim 20, at least because Sonesh does not teach the limitations of claim 1, from which claim 20 depends. Additionally, Sonesh does not teach the limitation "wherein a row in the department table is selected by the input signals from the caller; and wherein the columns of the selected row contain information used by the call manager to implement the call-management policy." Sonesh discloses no such structure as a department table, nor any such table included within a call object, nor any call object. Therefore, Sonesh fails to teach each and every limitation of claim 20.

Regarding claim 21, Applicant respectfully submits that Sonesh does not teach the limitations of claim 21, at least because Sonesh does not teach the limitations of claim 20, from which claim 21 depends. Furthermore, Sonesh fails to teach the limitation "wherein the columns of the selected row include fields for specifying...the availability of another department." Instead, Sonesh simply queues calls when an agent is not available.

Regarding claim 22, Applicant respectfully submits that Sonesh does not teach the limitations of claim 22, at least because Sonesh does not teach the limitations of claim 1, from which claim 22 depends. Moreover, Sonesh fails to teach the limitation "wherein each call object is an element of an array of call objects managed by the call manager object," for the reasons given with respect to claim 1. Specifically, Sonesh does not teach the use of a call object, or its inclusion in an array that is managed by a call manager object.

Regarding claim 23, Applicant respectfully submits that Sonesh does not teach the limitations of claim 23, at least because Sonesh does not teach the limitations of claim 1, from which claim 23 depends. Moreover, Sonesh does not teach the limitation "wherein the call manager can invoke any one of the call objects to play a voice menu, record a caller message, to transfer a call, or to obtain another department table for the call associated with the call object."

The cited portion of Sonesh, Col. 7, lines 12-46, makes no mention of a call object, nor the invocation of a call object by a call manager. Therefore, Sonesh does not teach each and every limitation of Applicant's invention as recited in claim 23.

Regarding items 6 and 7, the Office Action has alleged that claims 7 and 27 are not patentable under 103(a) over Sonesh in view of Reksten, U.S. Patent No. 6,396,909.

Specifically in regard to claim 7, the Office Action alleges that Applicant's invention as recited in claim 7 would have been obvious to one of skill in the art in light of the combination of Sonesh and Reksten. Reksten describes an inter-system call transfer which permits a call routed to a host that is unable to process the call to be redirected to another host that is able to process the call. Reksten, Col. 3, lines 65-67.

Applicant submits that the combination of Sonesh and Reksten does not teach or suggest the claimed invention as recited in claim 7, at least because the combination fails to teach or suggest the limitations of claim 6, from which claim 7 depends. Specifically, the combination fails to teach the limitations of claim 1, from which claim 6 depends and does not teach the limitation "wherein in a table includes alternate routing information...if the agent is not available, handling the call according to alternate routing information." Instead, the combination teaches that if an agent is not available, the call is placed in an appropriate queue, because Reksten does not alter or add to the teachings of Sonesh in this respect. Reksten only teaches that if the host is not available the call should be transferred to an available host. Furthermore, the combination of Sonesh and Reksten does not teach the limitation "wherein the alternate routing information includes voice mail box information and operator information...determining whether or not voice mail box is available for the department according to the table," as recited in claim 7, because the combination does not teach the use of a table in a call object, where the table in the call object has alternate routing information. Sonesh teaches that the call should be routed to a queue and Reksten teaches that the call should be routed to another host. Therefore, the combination of Sonesh and Reksten does not teach or suggest to one of skill in the art the invention as recited in claim 7.

The Office Action has alleged that Applicant's invention, as recited in claim 27, would have been obvious in light of the combination of Sonesh and Reksten. Applicant respectfully submits that the combination of Sonesh and Reksten does not teach or suggest Applicant's invention as recited in claim 27, because the combination fails to teach or suggest the limitations

of claim 26, from which claim 27 depends. Specifically, the combination fails to teach the limitation "each call object including the department table with which the call is currently associated...if an agent is not available and if another department table is available, (g) obtaining another department table from the organization database and continuing at step (c)," as recited in claim 26. The combination does not teach the use of a table in a call object, or the use of another table when an agent is not available. Furthermore, the combination fails to teach or suggest the limitation prior to step (h), if another department table is not available, (j) determining from the table whether department voice mail is available," as recited in claim 27, because the combination fails to teach or suggest the use of a table in a call object where, if another table is not available, the call is transferred to a department voice mail. Instead, Sonesh teaches that a call should be transferred to a queue and Reksten teaches that a call should be transferred to another host. The portion of the specification, Col. 6, lines 4-25, in Reksten cited in the Office Action makes only a general mention of voice mail and does not teach or suggest the above limitations. Therefore, the combination does not teach or suggest Applicant's invention as recited in claim 27.

Regarding item 8, the Office Action has alleged that claims 14-19 and 32-34 are unpatentable over Sonesh, under section 103(a).

Regarding claims 14-19, Applicant respectfully submits that Sonesh does not teach or suggest the use of Java objects in the department table as recited in claims 14-19, because Sonesh does not teach or suggest the use of call objects. Without the teaching of call objects, there is no suggestion to use Java objects in the call objects, as is recited in claim 14-19. Therefore, Applicant's invention as recited in claim 14-19 would not have been obvious in light of Sonesh.
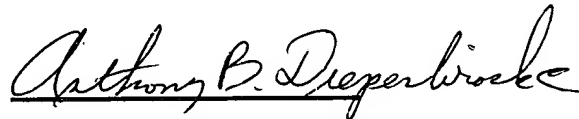
Regarding claims 32, Applicant respectfully submits that Sonesh does not teach or suggest the use of an interface to allow the call manager object and call objects to respond to hardware events pertaining to an incoming call because Sonesh does not teach or suggest the use of a call manager object or the use of call objects or the use of tables within a call object, as recited in claim 31, from which claims 32 depends. Similarly, regarding claims 33 and 34, Sonesh does not teach or suggest the limitation "the table is a JDBC-accessible table" or "the table contains Java objects," as recited therein, again because Sonesh does not teach the use of call objects or the use of tables within call objects.

Additionally, Applicant submits that there is no suggest to combine the teachings of Sonesh with the teachings of Reksten. First, it is unclear why one with knowledge of Sonesh would have looked to Reksten, as there is no suggestion in Sonesh regarding the unavailability of the host MMACD server. The concern in Sonesh to provide automatic call distribution (ACD) with a multi-media server, not backup of the server if it should be unavailable. Second, it is unclear why one with knowledge of Reksten would have looked to Sonesh to provide a multi-media server. Reksten teaches the use of a network applications platform (NAP) that perform many functions, but appears not to operate as an automatic call distribution system, as taught in Sonesh. Reksten, Col. 6, lines 30-35. Because the architectures and uses are so different, Applicant fails to see the motivation to combine Sonesh with Reksten.

Thus, in light of the above, Applicants respectfully request reconsideration and allowance of the pending claims in the above-mentioned application.

Date: April 2, 2003
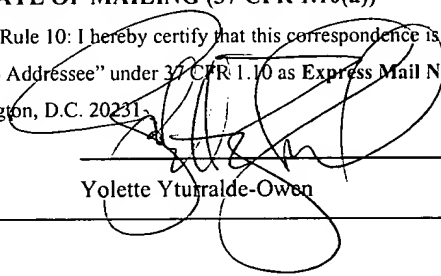
Respectfully submitted

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